

Exhibit B

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

JOHN AND JANE DOE NO. 1, *et al.*,)
Plaintiffs,)
v.) Case No. 3:22-cv-00337
BETHEL LOCAL SCHOOL DISTRICT)
BOARD OF EDUCATION, *et al.*,) Judge: Michael J. Newman
Defendants.)
)

DECLARATION OF JOANNE ROE

I, Joanne Roe¹, declare as follows:

1. I have actual knowledge of the matters stated in this declaration, which I submit in support of Anne Roe's motion to intervene in the above-captioned matter.
2. I am a 40-year-old resident of Tipp City, Ohio.
3. I am the mother of three children, including Anne Roe, and the stepmother to two children.
4. Anne and my youngest biological child currently attend Bethel High School and Bethel Elementary School, respectively.
5. My oldest biological child attended and graduated from Bethel High School in 2021.

¹ Counsel for Proposed Intervenor have also filed a Motion to Proceed Pseudonymously on behalf of Joanne Roe.

ANNE ROE

6. My husband, John Roe, and I have been together since 2011. He has been heavily involved in raising and supporting Anne Roe.

7. I have always known that Anne was not like the boys her age. From a young age, she was very feminine in her demeanor and interests. She like playing with dolls instead of playing with trucks. I remember her as a child wanting to wear dresses and heels, and to paint her nails.

8. At that time, I did not know or understand what it meant to be transgender. I just assumed that Anne was feminine.

9. Without fully understanding who she was, I tried to encourage Anne to be more masculine by telling her to play with trucks, for example.

10. When she was about 8 years old, Anne told me and John Roe that she was transgender. She had just returned from spending time with her uncle, who is a transgender man, and told us that she was a transgender girl.

11. I did not know what that meant, and I initially assumed that she was just trying to be like her transgender uncle. Looking back now, I wish that I had spent more time trying to understand what Anne was telling us, and learning about how to support her.

12. For the next few years, we continued to treat Anne like a boy. During this time, she became very depressed and anxious. She was very introverted, not wanting to interact with others. I was so scared for her but did not know what to do.

13. When she was 11 years old, I found Anne searching for puberty blockers to purchase on the internet. At this point, I realized that her being transgender was not a phase or

something that we could just ignore. I realized that in order for her to live a long and healthy life, she would need our love and support.

14. In or around September 2019, Anne began receiving therapy to help support her mental wellness. She also began receiving other medical care to treat her gender dysphoria.

15. In late 2019, she was prescribed and began taking puberty blockers, which prevented her from undergoing the physical changes associated with male puberty.

16. In September 2021, she began hormone therapy, to further align her body with her gender identity.

17. Receiving this treatment for her gender dysphoria has radically changed Anne. She used to struggle with depression, and anxiety, and she used to harm herself. Now she is completely flourishing.

18. When I look at her now, I can see that she is the person that she is supposed to be.

BETHEL LOCAL SCHOOL DISTRICT

19. In 2019, John Roe and I decided to move the family from Greene County, Ohio to Miami County, Ohio.

20. Anne Roe had been experiencing severe bullying and harassment throughout her enrollment in Fairborn City Schools because she is transgender, and we hoped to give her a fresh start at a new school.

21. We thought that a smaller and more rural community would be welcoming, and that Anne would experience less bullying and harassment at a smaller school.

22. In or about December 2019, I spoke with Tim Zeigler, who at that time was the Principal of Bethel Middle School. I informed him that we would be enrolling Anne in the

middle school's sixth grade class beginning in January of 2020. I also explained that Anne is a transgender girl.

23. During this discussion in December 2019, Mr. Zeigler, Anne and I all agreed that Anne would use the single occupancy bathroom in the Nurse's office, or the Faculty Restroom located between the middle school office and the high school office. We all reached this agreement because that is where Anne felt safest and the most comfortable at the time.

24. In January 2020, Anne was enrolled at Bethel Middle School and began attending classes with the other students after everyone returned from Winter Break.

25. From this time and until January 2022, Anne would use the single occupancy restroom in the Nurse's Office, or the Faculty Restroom located between the middle school office and the high school office.

26. Over time, Anne began telling me that she was feeling alienated for having to use a separate restroom because she was being harassed and taunted by other students. She also started experiencing urinary tract infections because the restrooms that she used were inconveniently located or were occupied by others when she needed to use them.

27. I told Anne repeatedly that she could not hold in her urine all day because it is dangerous for her health.

28. Since birth, Anne has had a medical condition that makes it very important for her to have easy access to restrooms. For years, her doctors have consistently told her, and me, that Anne should never attempt to hold in urine, and should go to the restroom immediately when she needs to. When her doctor reiterated that advice in or around late 2021, Anne explained that she only had access to single-occupancy restrooms. Her doctor suggested seeking an accommodation.

29. Eventually, we agreed that it would be safer and healthier for Anne if she were allowed to use the girls' communal restrooms, in addition to the single-use restrooms. We had not previously discussed this option with the school, so I wanted to confirm that Anne would be allowed to do so.

THE SCHOOL DISTRICT'S ACCOMMODATION

30. During the Summer of 2021, I learned that Mr. Zeigler was replaced as Bethel Middle School Principal by Matt Triplett.

31. On August 23, 2021, I emailed Mr. Triplett to schedule a meeting to discuss Anne's experiences at Bethel Middle School, and to identify some of her needs moving forward.

32. Shortly after sending this email, I received a phone call from Mr. Triplett in response to my email. I informed him about the problems that Anne was experiencing with regard to the restrooms. I explained that she was having health issues because her restroom access was limited to only two single-use bathrooms. I asked if the school would grant her an accommodation to use the girls' communal restroom in addition to the two single-use restrooms she was already allowed to use. Mr. Triplett said that the matter would be discussed and that he would let me know the outcome of that discussion.

33. On December 5, 2021, I emailed Mr. Triplett to inform him that Anne's experiences were worsening and to set up a meeting to discuss whether Anne would be granted the accommodation.

34. On December 17, 2021, Anne Roe, John Roe and I met with Mr. Triplett and Justin Firks, who was the Superintendent of Bethel Local School District at that time. At this meeting, Mr. Triplett and Mr. Firks informed us that Anne would be allowed to use the girls' communal restroom once she returned from Winter Break in January of 2022.

35. In January of 2022, Anne began using the girls' communal restroom in addition to the single-use restrooms, depending on which is more convenient or accessible. She continues to do so to this day.

36. Since being granted this accommodation, Anne has had no urinary tract infections. Even more than that, she seems like a whole different person, visibly more invested in school and her extracurricular activities. She went from being anxious and depressed to extremely outgoing.

37. Before this change, Anne would rush home after school in order to relieve herself after having held in her urine all or most of the day. After this change, she has been able to focus more on her academic performance, extracurricular activities, and even on building friendships with her classmates.

38. After this change, her grades also improved, which I believe is a direct result of her being able to concentrate more fully now that she is not distracted by her need to use the restroom.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 16th, 2023



Joanne Roe